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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

## IN RE FIBROGEN, INC., SECURITIES LITIGATION

Case No. 3:21-cv-02623-EMC

## **CLASS ACTION**

**[PROPOSED] CLASS DISTRIBUTION  
ORDER AS MODIFIED**

1 Having considered all materials and arguments submitted in support of Lead Plaintiffs'  
 2 Unopposed Motion for Class Distribution Order (the "Motion"), including the Memorandum of  
 3 Law in Support of the Motion, the Declaration of Luiggy Segura in Support of Lead Plaintiffs'  
 4 Unopposed Motion for Class Distribution Order (the "Segura Declaration"),

5 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

6 1. This Class Distribution Order incorporates by reference the definitions in the  
 7 Stipulation and Agreement of Settlement, dated December 7, 2023 (ECF No. 236, Exhibit 1) (the  
 8 "Stipulation" or "Settlement Agreement"), and all capitalized terms not otherwise defined herein  
 9 shall have the same meanings as set forth in the Stipulation or the Segura Declaration.

10 2. The Court has jurisdiction over the subject matter of the Action and over all parties  
 11 to the Action, including all Settlement Class Members.

12 3. As set forth in the Segura Declaration, the administrative determinations of the  
 13 Claims Administrator in accepting and rejecting Claims are approved. The Claims set forth in  
 14 Exhibit C ("Timely Eligible Claims") and Exhibit D ("Late But Otherwise Eligible Claims") to  
 15 the Segura Declaration are APPROVED, and the distribution of the Net Settlement Fund to the  
 16 Authorized Claimants is AUTHORIZED.

17 4. Wholly ineligible or otherwise deficient claims ("Rejected Claims"), as set forth in  
 18 Exhibit E to the Segura Declaration, are REJECTED.

19 5. The distribution of the Net Settlement Fund to Authorized Claimants is hereby  
 20 AUTHORIZED and shall be conducted in accordance with the Settlement Agreement, the Court  
 21 approved Plan of Allocation, and the Distribution Plan for payment of the Net Settlement Fund set  
 22 forth in the Segura Declaration, which is hereby APPROVED.

23 6. No Claims received or adjusted after December 2, 2024 will be eligible for payment  
 24 for any reason.

25 7. At such time as Lead Counsel, in consultation with the Claims Administrator,  
 26 determine that no additional distributions are cost-effective, the remaining balance of the Net  
 27 Settlement Fund, after payment of any unpaid notice and administration costs, taxes, the costs of  
 28

preparing appropriate tax returns, and any escrow fees, shall be contributed to Investor Protection Trust, a non-sectarian, not-for-profit 501(c)(3) organization.

8. JND shall be paid the outstanding balance of its fees and expenses in connection with the services to be performed in conducting the Initial Distribution in the total amount of \$289,064.22. If the incurred fees and expenses are lower than the estimate, JND shall promptly reimburse the Net Settlement Fund.

9. All persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of Claims submitted herein, or otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund, are released and discharged from all claims arising out of such involvement, and all Settlement Class Members and other Claimants, whether or not they are to receive payment from the Net Settlement Fund, are barred from making any further claim against the Net Settlement Fund, Lead Plaintiffs or their counsel, the Claims Administrator, the Escrow Agent, or any other agent retained by Lead Plaintiffs or Lead Counsel in connection with the administration or taxation of the Settlement Fund or the Net Settlement Fund, or any other person released under the Settlement beyond the amounts allocated to Authorized Claimants.

10. The Claims Administrator is authorized to destroy the paper copies and electronic copies of the Claims and all supporting documentation one year after Distribution of the Net Settlement Fund is complete.

11. This Court retains jurisdiction to consider any other further applications concerning the administration of the Settlement, and such other and further relief as this Court deems appropriate.

SO ORDERED this 15 day of January, 2025.

**Within 150 days of this order, the parties shall jointly file a post-distribution accounting status report.**

The Honorable Edward M. Chen  
United States District Judge